

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 16-CR-21 (WED)

SAMY M. HAMZEH,

Defendant.

SECOND MOTION FOR EXTENSION OF TIME

Samy Hamzeh, by counsel, files this motion for extension of time to file pretrial motions. I have conferred with AUSA Paul Kanter, and he has no objection to this request.

Today the defense is filing three pretrial motions and an omnibus brief in support. There is an additional motion that we plan to file that concerns ordering the government to produce verbatim transcripts of the recordings in this case. In order to establish the basis for this motion, many facts of this case will be revealed to the public. In order to comply with protective order, the defense would like to send a draft to AUSA Paul Kanter and make sure that the parties are on the same page. He is currently out of the office and will be back next week, so the defense would like to have until Friday March 3 to file its fourth pretrial motion. Additionally, the defense would ask that the government be provided an additional week to file its response to our motions.

*Federal Defender Services
of Wisconsin, Inc.*

Thus, the defense respectfully requests that the Court grant this motion, allow the defense to file its additional pretrial motion on March 3, put the government's response due on March 31, 2017, and the defense's reply on April 14, 2017.

Dated at Milwaukee, Wisconsin this 24th day of February, 2017.

Respectfully submitted,

/s/ Joseph A. Bugni
Joseph A. Bugni, WI Bar #1062514
Craig W. Albee, WI Bar #1015752
FEDERAL DEFENDER SERVICES
OF WISCONSIN, INC.
517 E. Wisconsin Ave - Rm 182
Milwaukee, WI 53202
Tel.: (414) 221-9900
E-mail: joseph_bugni@fd.org
craig_albee@fd.org

Counsel for Defendant, Samy M. Hamzeh